

February 24, 2021

David Albright
Drinking Water Protection Section (WTR 3-2)
Environmental Protection Agency, Region 9
75 Hawthorne St
San Francisco, CA 94105

Subject: Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1
30-Day Report for AL/AQL Exceedance for Adjusted Gross Alpha at Supplemental Monitoring
Well M60-O

Dear Mr. Albright:

Florence Copper is providing this 30-day report for an alert level (AL) and Aquifer Quality Limit (AQL) exceedance for adjusted gross alpha at supplemental monitoring well M60-O under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit) under Parts II.H.2.a.iv and II.H.2.b.iv.

On December 29, 2020, Florence Copper became aware of a potential AL and AQL exceedance for adjusted gross alpha at well M60-O from a sample collected on December 10, 2020. The laboratory result for this sample was 20.4 ± 2.7 pCi/L. The AL and the AQL for adjusted gross alpha are both 17.4 pCi/L for this well. The verification sample collected on January 7, 2021 confirmed the AL/AQL exceedance with an adjusted gross alpha result of 18.7 ± 2.5 pCi/L on January 25, 2021. As outlined in Parts II.H.2.a. and II.H.2.b. of the Permit, on January 27, 2021 Florence Copper submitted the 5-day notification report to EPA.

Following verification of the exceedance, Florence Copper initiated an investigation into the cause of the AL exceedance. No malfunction or failure of pollution control devices or other equipment or processes occurred that contributed to the alert level exceedance. Hydraulic control on the south side of the wellfield has been maintained as required by the permit throughout operation of the PTF and during the current rinsing activities.

A prior confirmed exceedance for adjusted gross alpha was reported to EPA on November 27, 2020. In that report, Florence Copper indicated that various mitigation measures had been implemented following the confirmed exceedance, including additional pumping and redevelopment of M60-O and downgradient observation well O-04. Between redevelopment and the ongoing rinsing of the wellfield, specific conductance at O-04 had decreased by approximately 3,000 $\mu\text{S}/\text{cm}$. At the time of the November 30-day report, results from an additional sample taken at M60-O on November 5th were pending. These results have since been received, and showed adjusted gross alpha below the AL/AQL at 13.2 pCi/L.



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However, as noted above, the subsequent sample results for adjusted gross alpha were above the AL/AQL. Based on an evaluation of the conductivities in the wells closest to M60-O, it was determined that pumping recovery well R-05 at a higher flow rate could be implemented as a corrective action for M60-O. Recovery well R-05 is approximately 130 feet northeast of M60-O, and its pumping rate was increased by 5 gpm the week of February 22nd. Florence Copper will continue to closely monitor the conductivities in these wells, and adjust the flow rate, if necessary.

Please contact me if you have any questions.

Sincerely,
Florence Copper, Inc.

 FOR BRENT BERG
Brent Berg
General Manager

Cc: Nancy Rumrill, EPA Region 9
Maribeth Greenslade, ADEQ